



Charles Wohlrab, Esq.  
**FRIEDMAN VARTOLO LLP**  
1325 Franklin Avenue, Suite 160  
Garden City, NY 11530  
Attorneys for SN Servicing Corporation as Servicer for  
U.S. Bank Trust National Association, as Trustee of LB-  
Igloo Series IV Trust  
T: (212) 471-5100  
F: (212) 471-5150  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

Order Filed on February 25, 2025  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

-----X  
IN RE:

CASE NO.: 25-10323-JNP

Daniel Torres, CHAPTER 13

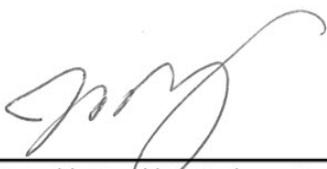
Debtor. Judge: Jerrold N. Poslusny, Jr.

-----X

**CONSENT ORDER RESOLVING CREDITOR'S OBJECTION TO  
DEBTOR'S CHAPTER 13 PLAN**

The provisions set forth on the following pages, numbered two (2) through three (3), is hereby **ORDERED**.

**DATED: February 25, 2025**

  
Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

Debtors: Daniel Torres  
Case No.: 25-10323-JNP  
Caption of Order: CONSENT ORDER RESOLVING CREDITOR'S OBJECTION TO  
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

---

THIS MATTER having been brought before the Court by Andrew Thomas Archer, Esquire, attorney for Debtor, Daniel Torres, upon filing of a Chapter 13 Plan (Doc.: 3); and Creditor, SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of LB-Igloo Series IV Trust, by and through its attorneys, Friedman Vartolo, LLP, having objected to said Chapter 13 Plan; and the Court noting the consent of the parties to the form, substance, and entry of the within Order; and for good cause shown, it is hereby

**IT IS HEREBY ORDERED** as follows:

1. Secured Creditor agrees to a specified period of time to allow Debtor an opportunity to submit a Loss Mitigation application in connection with the mortgage loan secured by the real property located at 540 Diamond Spring Avenue, Lawnside, NJ 08045.
2. Debtor must submit a complete loss mitigation package to Secured Creditor by March 1, 2025. If the Debtor fails to submit a complete loss mitigation package by March 1, 2025, Secured Creditor may file a Certification of Default of this Order to terminate the automatic stay as to its interest in the aforementioned real property.
3. If the Debtor fails to obtain a loan modification by August 1, 2025, Debtor shall be required to file a Modified Chapter 13 Plan to fully cure Secured Creditor's pre-petition arrearages with remaining Chapter 13 Plan proceeds or otherwise satisfy Secured Creditor's pre-petition arrearages claim. Failure to file a satisfactory Modified Chapter 13 Plan within fourteen (14) days of the conclusion of the loss mitigation review shall entitle Secured Creditor to file a Certification of Default of this Order to terminate the automatic stay as to its interest in the aforementioned real property. If the loss mitigation review remains pending, Debtors and/or Secured Creditor may submit an Application to this Court to extend the August 1, 2025 deadline referenced in this paragraph.
4. Starting February 1, 2025, Debtor agrees to maintain regular monthly payments to Secured Creditor until completion of the Loss Mitigation review. If the Debtor fails to make any regular mortgage payment(s) within thirty (30) days of the due date, Secured Creditor may file a Certification of Default of this Order to terminate the automatic stay as to its interest in the aforementioned real property.
5. Secured Creditor's Objection to Confirmation of Plan (Doc.: 13) is hereby resolved by this Order.
6. This Order shall be incorporated in and become part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form and entry of the within Order:

Date: 2/24/2025

/s/ Charles Wohlrab

Charles Wohlrab, Esquire

Friedman Vartolo, LLP

*Counsel for Creditor*



Date: 2/13/25

  
Andrew Thomas Archer, Esquire

Brenner Spiller & Archer

*Counsel for Debtor*

In re:  
Daniel Torres  
Debtor

Case No. 25-10323-JNP  
Chapter 13

District/off: 0312-1  
Date Rcvd: Feb 26, 2025

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

**Symbol      Definition**

- + Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 28, 2025:**

<b>Recip ID</b>	<b>Recipient Name and Address</b>
db	+ Daniel Torres, 32 Berkshire Drive, Sewell, NJ 08080-3103

TOTAL: 1

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Feb 28, 2025

Signature: /s/Gustava Winters

---

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 26, 2025 at the address(es) listed below:

Name	Email Address
Andrew B Finberg	ecfmail@standingtrustee.com ecf.mail_9022@mg.bkdocs.us
Andrew Thomas Archer	on behalf of Debtor Daniel Torres aarcher@spillerarcherlaw.com bankruptcy@brennerlawoffice.com;mcdoherty_187750@ecf.courtdrive.com
Charles G. Wohlrab	on behalf of Creditor SN Servicing Corporation as Servicer for U.S. Bank Trust National Association as Trustee of LB-Igloo Series IV Trust bkecf@friedmanvartolo.com, cwohrlab@ecf.courtdrive.com
Denise E. Carlon	on behalf of Creditor MIDFIRST BANK dcarlon@kmllawgroup.com bkgroup@kmllawgroup.com
U.S. Trustee	USTPRegion03.NE.ECF@usdoj.gov

District/off: 0312-1

User: admin

Page 2 of 2

Date Rcvd: Feb 26, 2025

Form ID: pdf903

Total Noticed: 1

TOTAL: 5